#### **TABLE OF PHASE CODES (Tasks and Incremental Costs)**

#### 1. APPLYING PHASE CODES:

The Cost Work Sheet must be prepared using a "Phase Code" (unless the Cost Work Sheet is submitted as part of a Direct Payment Request associated with a Preapproval Application that was approved using Activity Codes instead of Phase Codes). The "Phase Code" is an alphanumeric code identifying the applicable Phase of Corrective Action, Task completed during the Phase, and, if applicable, an Increment necessary to complete the Task. The following table lists the Phase Codes to be used when completing the Cost Work Sheet submitted with the SAF Application or Request.

Each Phase Code includes the following: The first alpha character indicates the Phase of Corrective Action, the following numerical character is the Task and the following alpha character is the Increment. For example, the Phase Code "C1A" is used to identify:

C = Phase C - "Site Investigation"

1 = Task - "Soil Boring Drilling and Sampling"

A = Increment - "Consultant – Pre- Field Coordination and Make Ready"

To complete the Cost Work Sheet, refer to the instructions in the applicable SAF Application or Request. The Phase Code is required to be entered into the applicable "Phase Code Column."

Phase Codes are task-based and include all associated costs for completion of the Task. Some Tasks also include Phase Codes for Increments, if an Increment is identified, please use the Phase Code for the Increment.

See Pages 9 and 10 of table for additional comments and footnotes.

#### 2. CLAIMING COSTS:

In accordance with A.A.C. R18-12-608(C)(1)(h):

- A) To the extent practicable, all costs for a task and all incremental costs associated with the task are to be included in the same reimbursement application or direct payment request.
- B) If it is not practicable to include all costs for a task and all incremental costs in the reimbursement application or direct payment request, a rationale for the costs that have not been included shall be provided in the summary of work. (Summary of Work Form RA-4 for a Reimbursement Application or DP-6 for a Direct Payment Request)
- C) When the remaining costs for the task and all incremental costs are claimed, there must be a reference to the previously submitted Summary of Work that documents the rationale for not including all costs in one submittal.
- D) If the rationale explained in item B) and the reference to that rationale explained in item C) are not provided, costs will be denied.

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Tasks are identified in the "Table of Cost Schedule Item Codes" and "Table of Phase Codes." The "Table of Cost Schedule Item Codes" has a defined "unit of measure" to describe the unit/cost relationship to task-based cost items. Additionally, the "Table of Phase Codes" includes Tasks associated with corrective action Phases that are not included in the "Table of Cost Schedule Item Codes."

ADEQ has included in the "Table of Phase Codes" a "unit of measure" for each task identified. The "unit of measure" is to be used for claiming the total costs for the Task or any Incremental Cost associated with the Task per A.A.C. R18-12-608(C)(1)(h).

The following provides two scenarios for claiming costs per A.A.C. R18-12-608(C)(1)(h). Please note the "unit of measure" includes any pre-field planning, field time, post-field evaluation, laboratory analysis and waste disposal, etc. for the specific field activity that is related to Task.

A. The use of the unit of measure such as "per month" should include all work performed for the claimed Task and associated Incremental Costs in a 30 day time frame. The "per month" may or may not correlate to a calendar month.

Scenario: Claiming costs for a specific month of "operation and maintenance" (Task "I1" and any associated incremental costs). All costs incurred for work performed for "operation and maintenance" of a remedial system for a 30 day time frame must be claimed on one Application or Request.

To the extent that it *is not practicable* to include all incurred costs for that "month" time frame in one Application or Request, the applicant may provide a rationale for the costs that have not been included on the Summary of Work Form in which costs for that month are initially submitted.

Example: The applicant is claiming costs for May operation and maintenance and has not received a utility billing for the month of May and cannot wait until the utility billing is received to submit the "operation and maintenance" costs for May. The applicant may provide a rationale for the exclusion of utility costs and this rationale must be provided in the Summary of Work Form submitted in the Application or Request in which costs for the May "operation and maintenance" are initially claimed.

When the utility billing for May is submitted, the applicant must identify the Application or Request in which the Summary of Work was provided that includes the "rationale for its exclusion".

B. The use of the unit of measure such as "per event" should include all work performed for the Task and associated Incremental Costs for a given field activity. The field activity may be initiated and completed in a single day or it may occur over multiple days.

Scenario: Claiming costs for a groundwater sampling event (Task "D1" and any associated incremental costs). All costs incurred for work performed for groundwater sampling of monitoring wells which may or may not be completed in a single day.

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To the extent that it *is not practicable* to include all incurred costs for that "groundwater sampling" event in one Application or Request, the applicant may provide a rationale for the costs that have not been included on the Summary of Work Form in which costs for that groundwater sampling event are initially submitted.

Example: The applicant is claiming costs for a July groundwater sampling event and the waste disposal invoices has not been received and the applicant cannot wait until the waste disposal invoice is received to submit the "groundwater sampling" costs for July. The applicant may provide a rationale for the exclusion of waste disposal invoice and this rationale must be provided in the Summary of Work Form submitted in the Application or Request in which costs for the July "groundwater sampling" are initially claimed.

When the costs for the associated waste disposal that were excluded are submitted, the applicant must identify the Application or Request in which the Summary of Work was provided that includes the "rationale for its exclusion."

#### **TABLE OF PHASE CODES (Tasks and Incremental Costs)**

PHASE CODE	TASK / INCREMENTAL (Unit of Measure)	DESCRIPTION	
Phase A - R	Celease Confirmation <sup>1</sup>		
A1	Task (Per Event)	Soil Boring Drilling and Sampling	
A1A	Incremental	Consultant – Post-Field Evaluation and Project Management – Drilling and Sampling	
A2	Task (Per Event)	Sample Collection – Not Associated With Drilling	
A2A	Incremental	Consultant – Post-Field Evaluation and Project Management – Sample Collection Only	
A3	Task (Per Report)	14-Day Report Form	
Phase B - In	nitial Site Characterizati	on	
B1	Task (Per Report)	Initial Site Characterization Report	
B1A	Incremental	Site Reconnaissance and Field Receptor Survey [1/4 mile]	
B1B	Incremental	Initial Site Characterization Report – Update of Existing Form	
Phase C - S	ite Investigation <sup>2</sup>		
C1	Task (Per Event)	Soil Boring Drilling and Sampling	
C1A	Incremental	Consultant – Pre-Field Coordination and Make Ready	
C1B	Incremental	Consultant – Post-Field Evaluation and Project Management – Soil Boring Drilling and Sampling	
C2	Task (Per Event)	Bedrock Drilling and Sampling	
C2A	Incremental	Consultant – Pre-Field Coordination and Make Ready – Bedrock Drilling and Sampling	
C2B	Incremental	Consultant – Post-Field Evaluation and Project Management – Bedrock Drilling and Sampling	
C3	Task (Per Event)	Direct Push Sampling	
C3A	Incremental	Consultant – Pre-Field Coordination and Make Ready – Direct Push Sampling	
СЗВ	Incremental	Consultant – Post-Field Evaluation and Project Management – Direct Push Sampling	

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# July 1, 2008 Cost Schedule TABLE OF PHASE CODES (Tasks and Incremental Costs)

		Tasks and incremental costs)			
PHASE	TASK /	D TO COD YDDWY O Y			
CODE	INCREMENTAL	DESCRIPTION			
	(Unit of Measure)				
	Phase C - Site Investigation - Continued				
C4	Task (Per Event)	Well Installation (includes drilling and sampling)			
		and Well Development			
C4A	Incremental	Consultant - Pre-Field Coordination and Make Ready			
C4B	Incremental	Consultant - Post-Field Evaluation and Project Management – Well Installation			
C5	Task (Per Event)	Notice of Intent (NOI) Form Preparation (A.R.S. 45-596)			
C5A	Incremental	Notice of Intent (NOI) ADWR Fee (A.R.S. 45-596)			
C6	Task (Per Permit)	Right of Way Permit Preparation			
C6A	Incremental	Right of Way Permitting Fee			
C7	Task (Per Access )	Acquiring Off-Site Access			
C7A	Incremental	Off-Site Access Fee			
C8	Task (Per Plan)	Health and Safety Plan			
C8A	Incremental	Health and Safety Plan – Update			
Phase D -	Groundwater Monitoring	,3			
D1	Task (Per Event)	Groundwater Sampling			
D1A	Incremental	Consultant – Pre-field Coordination and Make Ready –			
		Groundwater Sampling			
D1B	Incremental	Consultant - Post-Field Evaluation and Project Management –			
		Groundwater Sampling			
D2	Task (Per Event)	Measurement of Fluid Level			
		(not associated with groundwater sampling of same wells)			
D2A	Incremental	Consultant – Pre-field Coordination and Make Ready –			
		Measurement of Fluid Level			
D2B	Incremental	Consultant - Post-Field Evaluation and Project Management –			
		Measurement of Fluid Level			
D3	Task (Per Event)	Monitoring Natural Attenuation			
D3A	Incremental	Consultant – Pre-Field Coordination and Make Ready –			
		Monitoring Natural Attenuation			
D3B	Incremental	Consultant - Post-Field Evaluation and Project Management –			
		Monitoring Natural Attenuation			
Phase E -	Aquifer Characterization				
E1	Task (Per Test)	Slug Test			
E1A	Incremental	Consultant – Pre-Field Coordination and Make Ready –			
		Slug Test			
E1B	Incremental	Consultant - Post-Field Evaluation and Project Management -			
		Slug Test			
E2	Task (Per Test)	Aquifer Pump Test			
E2A	Incremental	Consultant – Pre-Field Coordination and Make Ready –			
		Aquifer Pump Test			
E2B	Incremental	Consultant - Post-Field Evaluation and Project Management -			
		Aquifer Pump Test			

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# July 1, 2008 Cost Schedule TABLE OF PHASE CODES (Tasks and Incremental Costs)

PHASE CODE	TASK / INCREMENTAL (Unit of Measure)	DESCRIPTION			
Phase F - I	Phase F - Free Product Removal				
F1	Task (Per Event)	Free Product Removal (Includes fluid level measurement)			
F1A	Incremental	Consultant – Pre-Field Coordination and Make Ready –			
		Free Product Removal			
F1B	Incremental	Consultant – Post-Field Evaluation and Project Management –			
		Free Product Removal			
F2	Task (Per Test)	Bail Down Test			
F2A	Incremental	Consultant – Pre-Field Coordination and Make Ready – Bail Down Test			
F2B	Incremental	Consultant – Post-Field Evaluation and Project Management – Bail Down Test			
Phase G = 1	Pilot Testing	Ban Bown Test			
G1	Task (Per Event)	Consultant – Review of Potential Remedial Alternatives <sup>4</sup>			
G2	Task (Per Event)	Well Installation (includes drilling and sampling) and			
02	Tusk (Ter Eveni)	Well Development (also use for nested wells)			
G2A	Incremental	Consultant – Pre-Field Coordination and Make Ready –			
		Well Installation			
G2B	Incremental	Consultant – Post-Field Evaluation and Project Management –			
		Well Installation			
G3	Task (Per Event)	Bedrock Well Installation			
G3A	Incremental	Consultant – Pre-Field Coordination and Make Ready –			
		Bedrock Well Installation			
G3B	Incremental	Consultant – Post-Field Evaluation and Project Management –			
		Bedrock Well Installation			
G4	Task (Per Test)	Soil Vapor Extraction (SVE) Pilot Test			
G4A	Incremental	Consultant – Pre-Field Coordination and Make Ready – SVE Pilot Test			
G4B	Incremental	Consultant – Evaluation and Project Management of Pilot Test Data – SVE Pilot Test			
G5	Task (Per Test)	Combined SVE and AS Pilot Test			
G5A	Incremental	Consultant - Pre-Field Coordination and Make Ready – Combined SVE and AS Pilot Test			
G5B	Incremental	Consultant - Evaluation and Project Management of Pilot Test			
<b>Q</b> (	T. 1 (P. T. )	Data – Combined SVE and AS Pilot Test			
G6	Task (Per Test)	Multi-Phase Extraction (MPE) or			
G6A	Incremental	Dual Phase Extraction (DPE) Pilot Test  Consultant Pro Field Coordination and Make Peedy			
GOA	merementar	Consultant - Pre-Field Coordination and Make Ready – MPE or DPE Pilot Test			
G6B	Incremental	Consultant - Evaluation and Project Management of Pilot Test Data – MPE or DPE Pilot Test			
G7	Task (Per Test)	Other Pilot Test Method			
G7A	Incremental	Consultant - Pre-Field Coordination and Make Ready – Other Pilot Test Method			
G7B	Incremental	Consultant - Evaluation and Project Management of Pilot Test Data - Other Pilot Test Method			

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### July 1, 2008 Cost Schedule

#### **TABLE OF PHASE CODES (Tasks and Incremental Costs)**

PHASE CODE	TASK / INCREMENTAL (Unit of Measure)	DESCRIPTION
Phase G - P	ilot Testing – Continued	
G8	Task (Per Event)	Notice of Intent (NOI) Form Preparation (A.R.S. 45-596)
G8A	Incremental	Notice of Intent (NOI) ADWR Fee (A.R.S. 45-596)
Phase H - R	emedial Response	
H1	Task (Per Event)	Well Installation (includes drilling and sampling)
		and Well Development (also use for nested wells)
H1A	Incremental	Consultant – Pre-Field Coordination and Make Ready –
		Well Installation
H1B	Incremental	Consultant – Post-Field Evaluation and Project Management –
		Well Installation
H2	Task (Per Event)	Bedrock Well Installation
H2A	Incremental	Consultant – Pre-Field Coordination and Make Ready –
		Bedrock Well Installation
H2B	Incremental	Consultant – Post-Field Evaluation and Project Management –
		Bedrock Well Installation
Н3	Task (Per Design) –	Consultant –
	see Cost Item Code	Pre-Built Engineering Design for Active Remedial System
	#126	
H4	Task	Remedial System Installation* for Active Remedial System
	(Per System Install)	(See Cost Schedule General Notes)

\* Time and materials detail for actual incurred costs for H4 should be claimed on the Cost Work Sheet per the following categories:

REMEDIAL SYSTEM INSTALLATION CATEGORY	UNITS	X	UNIT COST	UNIT COST DESCRIPTION
Trenching and Backfill		X		\$/LF
Piping within Trench		X		\$/LF
Resurfacing (trench area to prior condition)		X		\$/SF
Well Head Modifications		X		\$/Well
Well Electrics		X		\$/well
Well Plumbing		X		\$/Well
System Equipment Plumbing / Equipment Set up		X		T&M Required
Compound Fencing		X		\$/LF
Concrete Slab		X		\$/CY
Removal of Construction Debris		X		T&M Required
Miscellaneous (must identify)		X		T&M Required

H4A	Incremental	Consultant – Pre-Field Coordination and Make Ready –	
		Remedial System Installation (Active Remedial System)	
H4B	Incremental	Consultant – Post-Field Evaluation and Project Management –	
		Remedial System Installation (Active Remedial System)	
H5	Task (Per Start-up)	Remedial System Start-up (Active Remedial System	
H5A	Incremental	Consultant – Pre-Field Coordination and Make Ready –	
		Remedial System Start-up (Active Remedial System)	
H5B	Incremental	Consultant – Post-Field Evaluation and Project Management –	
		Remedial System Start-up (Active Remedial System)	

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# July 1, 2008 Cost Schedule TABLE OF PHASE CODES (Tasks and Incremental Costs)

PHASE CODE	TASK / INCREMENTAL (Unit of Measure)	DESCRIPTION	
	Remedial Response – Con		
H6	Task (Per Design)	Remedial System Engineering Design for Initial Treatment (Passive Remedial System) <sup>5</sup>	
H7	Task (Per Treatment)	Initial Treatment (Passive Remedial System) <sup>5</sup>	
Н7А	Incremental	Consultant – Pre-Field Coordination and Make Ready – Initial Treatment (Passive Remedial System) <sup>5</sup>	
Н7В	Incremental	Consultant – Post-Field Evaluation and Project Management – Initial Treatment (Passive Remedial System) <sup>5</sup>	
H8	Task (Per Event)	Notice of Intent (NOI) Form Preparation (A.R.S. 45-596)	
H8A	Incremental	Notice of Intent (NOI) ADWR Fee (A.R.S. 45-596)	
Н9	Task (Per Event)	Air Quality Permit Application	
H9A	Incremental	Air Quality Permit Application Fee	
H10	Task (Per Plan)	Health and Safety Plan	
H10A	Incremental	Health and Safety Plan – Update	
Phase I - O	peration and Maintenan		
I1	Task (Per Month)	Operation and Maintenance (Active Remedial System)	
I1A	Incremental	Consultant – Pre-Field Coordination and Make Ready – Operation and Maintenance	
I1B	Incremental	Consultant – Post-Field Evaluation and Project Management – Operation and Maintenance	
I2	Task (Per Treatment)	Application of Remedial Treatment (Passive Remedial System) <sup>5</sup>	
I2A	Incremental	Consultant – Pre-Field Coordination and Make Ready – Remedial Treatment (Passive Remedial System) <sup>5</sup>	
I2B	Incremental	Consultant – Post-Field Evaluation and Project Management – Remedial Treatment (Passive Remedial System) <sup>5</sup>	
I3	Task (Per Fee Billing)	Air Quality Permit Fees (Annual or Other)	
I4	Task (Per Report)	Air Quality Reporting (Semi-Annual or Other)	
Phase J – L	UST Closure and Decom		
J1	Task (Per Event)	Confirmation Soil Boring Drilling & Sampling	
J1A	Incremental	Consultant – Pre-Field Coordination and Make Ready – Drilling and Sampling	
J1B	Incremental	Consultant – Post-Field Evaluation and Project Management – Drilling and Sampling	
J2	Task (Per Event)	Well Abandonment	
J2A	Incremental	Consultant –Pre-Field Coordination and Make Ready – Well Abandonment	
J2B	Incremental	Consultant – Post-Field Evaluation and Project Management – Well Abandonment	

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# July 1, 2008 Cost Schedule TABLE OF PHASE CODES (Tasks and Incremental Costs)

TASE CODES (Tasks and Incremental Costs)				
PHASE	INCREMENTAL	DESCRIPTION		
CODE	(Unit of Measure)			
Phase J – LUST Closure and Decommissioning - Continued				
J3	Task (Per Event)	System / Site Decommissioning		
J3A	Incremental	Consultant –Pre-Field Coordination and Make Ready –		
		System / Site Decommissioning		
J3B	Incremental	Consultant – Post-Field Evaluation and Project Management –		
		System / Site Decommissioning		
J4	Task (Per Event)	Notice of Intent (NOI) Form Preparation (A.R.S. 45-596)		
J4A	Incremental	Notice of Intent (NOI) ADWR Fee (A.R.S. 45-596)		
Phase K -	Remedial Excavation			
K1	Task	Remedial Excavation		
	(Per Excavation)			
K1A	Incremental	Backfill and Compaction for Remedial Excavation		
K1B	Incremental	Resurfacing (only area of excavation, only to prior condition)		
K1C	Incremental	Consultant – Pre-Field Coordination and Make Ready –		
		Remedial Excavation		
K1D	Incremental	Consultant – Post-Field Evaluation and Project Management –		
		Remedial Excavation		
Phase L -	Tank Closure			
L1	Task (Per Event)	Tank Closure		
L1A	Incremental	Consultant – Pre-Field Coordination and Make Ready –		
		Tank Closure		
L1B	Incremental	Consultant – Post-Field Evaluation and Project Management –		
		Tank Closure		
L1C	Incremental	Resurfacing (only area of excavation, only to prior condition)		
L1D	Incremental	Backfill and Compaction for Tank Closure		
L1E	Incremental	Permanent Closure Assessment Report Form		
L2	Task (Per Event)	Over Excavation during Tank Closure (justification required) 6		
L2A	Incremental	Consultant – Pre-Field Coordination and Make Ready –		
		Over Excavation during Tank Closure		
L2B	Incremental	Consultant – Post-Field Evaluation and Project Management –		
		Over Excavation during Tank Closure		
L2C	Incremental	Backfill and Compaction for Over Excavation		
L2D	Incremental	Resurfacing (only area of excavation, only to prior condition)		
L3	Task (Per Event)	Contractor – Off-Site Transportation of Tank(s)		
		(disposal receipt required)		
	Risk-Based Evaluation			
M2	Task (Per Evaluation)	Tier 2 Risk-Based Evaluation		
		Note: If additional soil or groundwater data collection is		
		required, the actual field activities should be claimed under this Phase Code.		
M2A	Incremental	Risk Assessment Screening or Report –		
		Tier 2 Risk-Based Evaluation		

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#### July 1, 2008 Cost Schedule

#### **TABLE OF PHASE CODES (Tasks and Incremental Costs)**

TASK / TASK /		
PHASE	INCREMENTAL	DESCRIPTION
CODE	(Unit of Measure)	
Phase N - R		
N1	Task (Per Report)	45-Day Free Product Report
N2	Task (Per Report)	ADEQ-Approved Site Characterization Report (SCR)
N2A	Incremental	LUST Site Classification Form included with the SCR
N2B	Incremental	Risk Evaluation pursuant to A.A.C. R18-12-263.01(A)
N3	Task (Per Plan)	ADEQ-Approved Corrective Action Plan (CAP)
N3A	Incremental	LUST Site Classification Form (included with the CAP)
N4	Task (Per Form)	Notice of Remediation Form
N5	Task (Per Report)	Groundwater Monitoring Report and Remedial Progress Report
N6	Task (Per Report)	Periodic Site Status Report <sup>7</sup>
N7	Task (Per Report)	Corrective Action Completion Report
	, , ,	(previously titled "Post-Remediation Closure Report")
N8	Task (Per Report)	Other Required Regulatory Reports <sup>8</sup>
Phase O - I	nitial Abatement and / o	r Initial Response
O1	Task (Per Event)	Initial Vapor Monitoring or Sampling of Fire, Explosion or
		Vapor Hazard
O2	Task (Per Event)	Mitigation of Fire or Safety Hazard
Phase P - V	Vork Plan and SAF Appl	lication Preparation
P1	Task (Per Cost Item	Preparation of an ADEQ-Approved Site Characterization Work
	Code #155)	Plan – Soil Only
P2	Task (Per Cost Item	Preparation of an ADEQ-Approved Site Characterization Work
	Code #156)	Plan – Soil and Groundwater
P3	Task (Per Cost Item	Preparation of an ADEQ-Approved SAF Work Plan to
	Code #157)	Implement an Approved Corrective Action Plan
P4	Task	Preparation of an ADEQ-Approved SAF Work Plan to
	(Per Work Plan)	Implement Remediation without an Approved Corrective Action
		Plan
P5	Task (Per Cost Item	Preparation of a ADEQ-Approved PreApproval Application
	Code #158)	
P6	Task (Per Cost Item	Preparation of a Reimbursement or Direct Payment application
7.5	Code #159)	with less than or equal to 2 Primary Provider Invoices
P7	Task (Per Cost Item	Preparation of a Reimbursement or Direct Payment
	Code #160)	application with Greater than 2 Less than or Equal to 5 Primary
700	T 1 / P G 1	Provider Invoices
P8	Task (Per Cost Item	Preparation of a Reimbursement or Direct Payment
	#161)	application with 6 or More Primary Provider Invoices

#### **Notes:**

*Pre-field Coordination and Make Ready* = includes the project management associated with scheduling and planning the field event.

*Post-Field Evaluation and Project Management* = includes the evaluation of the data and the project management after the field event.

If the pre-field or post-field hours claimed can be associated with more then one phase, then split hours as appropriately as possible or footnote the hours on the worksheet of the SAF application.

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#### **Footnote References:**

Task D1 applies to groundwater sampling and includes fluid level monitoring for wells that are being sampled.

Task D2 applies to collection of fluid levels when no associated groundwater sampling is conducted.

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<sup>&</sup>lt;sup>1</sup> Phase A applies to release confirmation sampling.

<sup>&</sup>lt;sup>2</sup> Phase C applies to investigation of the vertical and lateral extent of contamination.

<sup>&</sup>lt;sup>3</sup> Phase D – Groundwater Monitoring:

<sup>&</sup>lt;sup>4</sup> Phase Code "G1" for "Review of Remedial Alternatives" is for review of ALL remedial alternatives for the site. This correlates to researching and review of which remedial alternative(s) may be eliminated as a possible remediation method and which method(s) may be appropriate at the site.

<sup>&</sup>lt;sup>5</sup> "Passive Remedial System" applies to "O.R.C", peroxide, nutrient injection, MNA, etc.

<sup>&</sup>lt;sup>6</sup> Phase Code "L2" applies to the over excavation of contaminated soil during UST closure.

<sup>&</sup>lt;sup>7</sup> Phase Code "N6" should be used for "status reports" pursuant to the 2002 Corrective Action Rule.

<sup>&</sup>lt;sup>8</sup> Phase Code "N8" should be used for reports (necessary for eligible UST corrective actions) prepared to satisfy permit requirements other than Air Quality. Phase Code "I4" should be used for Air Quality reporting.